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## REMARKS

Claims 2, 3, 10, 13, 14, and 20 are amended hereby. No claims are cancelled or added hereby. Accordingly, after entry of this response, claims 1-14, 16-20, and 22-23 will remain pending.

In the Office Action dated May 4, 2005, the Examiner rejected claims 1, 6-7, and 22 under 35 U.S.C. § 102(b) as anticipated by Blalock (U.S. Patent No. 5,647,913). Claims 8-9 and 18-19 were rejected under 35 U.S.C. § 103(a) as unpatentable over Blalock. In addition, the Examiner rejected claims 11-12, 16, and 23 under 35 U.S.C. § 103(a) as unpatentable over Blalock in view of Ishii et al. (U.S. Patent No. 5,571,366). The Applicant respectfully disagrees with each of these rejections and, therefore, respectfully traverses the same.

In the Office Action, the Examiner indicated that claim 17 was allowed. The Examiner also indicated that claims 2-5, 10, 13-14, and 20 would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. The Applicant would like to thank the Examiner for the indication of allowed and allowable subject matter. Claims 2-3, 10, 13-14, and 20 have been amended as suggested by the Examiner. Accordingly, the Applicant respectfully submits that claims 2-5, 10, 13-14, and 20 are now in a condition for allowance.

The Applicant respectfully submits that claims 1, 6-7, and 22 are not anticipated by Blalock because the reference does not describe each and every feature recited by the claims. As a result, Blalock cannot anticipate claims 1, 6-7, and 22. Accordingly, the Applicant respectfully requests that the Examiner withdraw the rejection under 35 U.S.C. § 102(b).

In contrast to the invention as recited by claims 1, 6-7, and 22, Blalock describes embodiments of a plasma reactor. Specifically, with reference to Figs. 1 and 2, Blalock describes a plasma reactor 10 with an electrically insulative shell 12, internal walls 14, and an internal reactor cavity 16. (Blalock at col. 3, lines 49-55.) Electrically conductive inductive



PAGE 10/12 * RCVD AT 8/4/2005 6:00:42 PM [Eastern Daylight Time] * SVR:USPTO-EFXRF-6/25 * DNIS:2738300 * CSID:703 905 2500 * DURATION (mm-ss):02-34

coils 18 are positioned external to the cavity 16 and the shell 12. (Blalock at col. 3, lines 56-57.) An internal electrode 22 is used to support a wafer and is connected to a conventional capacitively coupled bias power source 24. (Blalock at col. 3, lines 64-67.) A capacitive coupling plate 26 is positioned externally of the cavity 16, between the shell 12 and the inductive coils 18. (Blalock at col. 4, lines 1-3.) Fig. 3 illustrates an alternate embodiment where the inductive coils 18 and capacitive coupling plate 26 are embedded within the shell 12a. (Blalock at col. 5, lines 14-19.) As discussed at col. 4, lines 20-30, the capacitive coupling plate 26 may function as an electrostatic shielding means.

Blalock fails to describe each and every feature of the invention as recited by 1, 6-7, and 22. Among other features, Blalock fails to describe an electrostatic shield coupled to a process tube such that the electrostatic shield resides around the process tube and, at times of process tube removal from the plasma reactor, the electrostatic shield is extracted with the process tube. Nothing in Blalock, as discussed above, describes or suggests this feature.

To the contrary, it appears from Figs. 1 and 2 in Blalock that the capacitive coupling plate 26 is separated from the shell 12. Therefore, it appears that the plate 26 is not coupled to the shell 12 and would not be removed with the shell 12. Referring to Fig. 3, the plate 26 is embedded within the shell 12a and, therefore, does not surround the shell 12. In either case, there is no disclosure in Blalock that would suggest that the shell 12 is removed with the plate 26 under any circumstances. In fact, Blalock would seem to suggest that the plate 26 and the shell 12 cannot be removed from the apparatus. Referring to col. 4, lines 31-41, the walls 14 of the reactor 10 are cleaned *in situ*. Accordingly, it is reasonable to conclude that the plate 26 and the shell 12 are not removable from the reactor 10.

The Applicant respectfully submits that the deficiencies noted above with respect to Blalock also support the Applicant's assertion that Blalock cannot render unpatentable claims 8-9 and 18-19. Since Blalock fails to describe each and every feature as recited by claims 1,



PAGE 11/12 * RCVD AT 8/4/2005 6:00:42 PM [Eastern Daylight Time] * SVR:USPTO-EFXRF-6/25 * DNIS:2738300 * CSID:703 905 2500 * DURATION (mm-ss):02-34

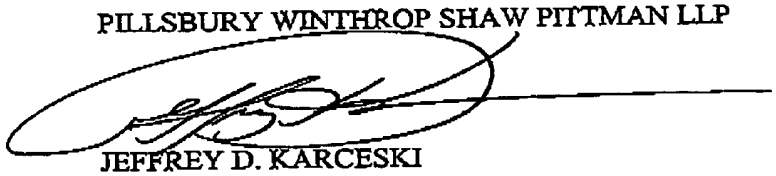
6-7, and 22, for at least the same reasons, it cannot be relied upon to suggest the invention as recited by claims 8-9 and 18-19. Accordingly, Blalock cannot be relied upon to render obvious these claims.

With respect to claims 11-12, 16, and 23, Ishii et al. does not assist the Examiner in fashioning a supportable rejection. While Ishii et al. does discuss an electrostatic shield means 91 (see, e.g., col. 12, line 54, through col. 13, line 31), Ishii et al. suffers from the same deficiency as Blalock. Specifically, there is no discussion of an electrostatic shield, made of a flex-print material, coupled to a process tube such that the electrostatic shield resides around the process tube and, at times of process tube removal from the plasma reactor, the electrostatic shield is extracted with the process tube. Accordingly, Ishii et al. cannot be combined properly with Blalock to render claims 11-12, 16, and 23 unpatentable.

Each of the rejections having been addressed, the Applicant respectfully requests that the Examiner reconsider the rejections under 35 U.S.C. §§ 102 and 103, withdraw the rejections, and pass this application to issue.

Please charge any fees associated with the submission of this paper to Deposit Account Number 033975. The Commissioner for Patents is also authorized to credit any over payments to the above-referenced Deposit Account.

Respectfully submitted,
PILLSBURY WINTHROP SHAW PITTMAN LLP



JEFFREY D. KARCESKI
Reg. No. 35914
Tel. No. 703 905.2110
Fax No. 703.905.2500

Date: August 4, 2005
P.O. Box 10500
McLean, VA 22102
(703) 905-2000



PAGE 12/12 * RCVD AT 8/4/2005 6:00:42 PM [Eastern Daylight Time] * SVR:USPTO-EFXRF-6/25 * DNIS:2738300 * CSID:703 905 2500 * DURATION (mm-ss):02-34